

REMARKS

Initially, in the Decision on Petition dated March 14, 2005, the Examiner notes that the Petition to Make Special filed filing date of Petition is defective for failing to provide a complete detailed discussion of the most closely related references with the necessary specificity with respect to claim 7. Applicants provide the following additional remarks.

The present invention as recited in the claims is directed to a method of controlling a storage system including a first storage device having a first storage volume provided at a first site, a second storage device having a second storage volume provided at a second site, and a third storage device having a third storage volume provided at a third site, the storage devices being connected so as to communicate with each other, wherein the method includes: storing a copy of data stored in the first storage volume in the second storage volume at a first time; writing the copy of data written in the first storage volume into the third storage volume; storing, in the third storage device, a write history of the data written in the first storage volume as a first differential management table after the first time; and allowing the third storage device to make contents of the data stored in the second storage volume consistent with contents of the data stored in the first storage volume using the first differential management table and the third storage volume of the third storage device.

It is submitted that the cited references, whether considered alone or in combination, fail to disclose or suggest the invention as claimed. In particular, the

cited references, at a minimum, fail to disclose or suggest storing, in a third storage device, a write history of the data written in a first storage volume as a first differential management table after the first time, and/or allowing the third storage device to make contents of the data stored in a second storage volume consistent with contents of the data stored in the first storage volume using the first differential management table and the third storage volume of the third storage device, and/or means for storing the write history of the data written into the storage volume as a second differential management table after a second time subsequent to the first time.

All of the independent claims recite at least one of these features or this feature, if there is only one. In particular, independent claim 1 recites storing, in a third storage device, a write history of the data written in a first storage volume as a first differential management table after the first time; and allowing the third storage device to make contents of the data stored in a second storage volume consistent with contents of the data stored in the first storage volume using the first differential management table and the third storage volume of the third storage device. Independent claim 4 recites means for storing, in a third storage device, a write history of the data written in a first storage volume as a first differential management table after the first time, and means for allowing the third storage device to make contents of the data stored in a second storage volume consistent with contents of the data stored in the first storage volume using the first differential management table and the third storage volume of the third storage device. Independent claim 7

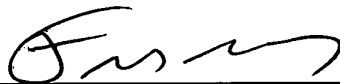
recites means for storing the write history of the data written into the storage volume as a second differential management table after a second time subsequent to the first time.

Therefore, since the references fail to disclose storing, in a third storage device, a write history of the data written in a first storage volume as a first differential management table after the first time, and/or allowing the third storage device to make contents of the data stored in a second storage volume consistent with contents of the data stored in the first storage volume using the first differential management table and the third storage volume of the third storage device, and/or means for storing the write history of the data written into the storage volume as a second differential management table after a second time subsequent to the first time, it is submitted that all of the claims are patentable over the cited references.

In view of the foregoing, Applicant requests that this Petition to Make Special be granted and that the application undergo the accelerated examination procedure set forth in MPEP 708.02 VIII.

Respectfully submitted,

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